

FILED

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

2020 SEP 16 PM 12:08

§ CRIMINAL NO. EP-20-CR

§ INDICTMENT

§ CT 1: 8:1324(a)(1)(A)(v)(I), (a)(1)(A)(ii) and
§ (a)(1)(B) (i)- Conspiracy to Transport Aliens;

§ CT 2: 8:1324(a)(1)(A)(ii)& (a)(1)(B)(ii) -
§ Transporting Aliens;

§ CT 3: 8 U.S.C. §§ 1324(a)(1)(A)(v)(I),
§ (a)(1)(A)(iii) and (a)(1)(B)(i)- Conspiracy to
§ Harbor Aliens;

CT 4: 8 U.S.C. §§ 1324(a)(1)(A)(iii) and (a)(1)(B)(ii) - Harboring Aliens.

EP20CR2022

COUNT ONE

(8 U.S.C. §§ 1324(a)(1)(A)(v)(I), (a)(1)(A)(ii) and (a)(1)(B)(i))

On or about August 19, 2020, in the Western District of Texas, Defendant,

JONATHAN EDWARD CHAVARRIA (1),

knowingly, intentionally, and unlawfully conspired, combined, and confederated, and agreed with others known and unknown to the Grand Jury, to commit offenses against the United States, namely: to transport and move and attempt to transport and move aliens within the United States knowing and in reckless disregard of the fact that said aliens had come to, entered, and remained in the United States in violation of law, said transportation being in furtherance of said violation of law, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), (a)(1)(A)(ii) and (a)(1)(B)(i).

COUNT TWO

(8 U.S.C. §§ 1324(a)(1)(A)(ii) & (a)(1)(B)(ii))

On or about August 19, 2020, in the Western District of Texas, Defendant,

JONATHAN EDWARD CHAVARRIA (1),

knowing and in reckless disregard of the fact that certain aliens had come to, entered and remained in the United States in violation of law, transported and moved, and attempted to transport and move such aliens within the United States, in furtherance of said violation of law, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (a)(1)(B)(ii).

COUNT THREE

(8 U.S.C. §§ 1324(a)(1)(A)(v)(I), (a)(1)(A)(iii) and (a)(1)(B)(i))

That on or about August 19, 2020, in the Western District of Texas, Defendants,

JONATHAN EDWARD CHAVARRIA (1)

and

SARA MARIE RENTERIA (2),

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together, and with others to the Grand Jury unknown, to commit offenses against the United States, namely: knowing and in reckless disregard of the fact that certain aliens had come to, entered and remained in the United States in violation of law, concealed, harbored, and shielded from detection, and attempted to conceal, harbor, and shield from detection such aliens, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), (a)(1)(A)(iii) and (a)(1)(B)(i).

COUNT FOUR

(8 U.S.C. §§ 1324(a)(1)(A)(iii) and (a)(1)(B)(ii))

On or about August 19, 2020, in the Western District of Texas, Defendant,

SARA MARIE RENTERIA (2),

knowing and in reckless disregard of the fact that certain aliens had come to, entered and remained in the United States in violation of law, concealed, harbored, and shielded from detection, and attempted to conceal, harbor, and shield from detection such aliens, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and (a)(1)(B)(ii).

A TRUE BILL **ORIGINAL SIGNATURE
REDACTED PURSUANT TO
E-GOVERNMENT ACT OF 2002**

FOREPERSON OF THE GRAND JURY

JOHN F. BASH
UNITED STATES ATTORNEY

BY: 

Assistant U.S. Attorney